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June 8, 2018

Via ECF

Hon. Sidney H. Stein,  
U.S. District Court for the Southern District of New York,  
United States Courthouse,  
500 Pearl Street,  
New York, New York 10007.

Re: *The Bank of Tokyo-Mitsubishi UFJ, Ltd. v. Maria Vullo*,  
No. 1:17-cv-08691

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Dear Judge Stein:

Under the Court's Individual Practice 1.E, I write on behalf of the Plaintiff to request a 10-page enlargement of the page limit that applies to Plaintiff's reply memorandum in support of its motion to dismiss Defendant's counterclaims. Defendant consents to this request.

On March 19, 2018, Plaintiff moved to dismiss Defendant's seven counterclaims (ECF Nos. 24–25) on the ground that they are preempted by federal law and also fail as a matter of New York law. (ECF Nos. 31–32.) With leave of the Court (ECF No. 30), Plaintiff filed an over-length opening memorandum of 30 pages. (ECF No. 32.) Defendant filed its opposition to Plaintiff's motion nine weeks later, on May 26, 2018. The Court granted Defendant permission to file an over-length opposition of 35 pages. (ECF No. 41.) Plaintiff's reply memorandum is due on June 18, 2018.

In its opposition to Plaintiff's motion to dismiss, Defendant challenged the validity of the federal banking licenses issued to Plaintiff by the Office of the Comptroller of the Currency. Plaintiff did not address that issue in its opening memorandum because Defendant's counterclaims, the subject of Plaintiff's motion, nowhere challenge the validity of Plaintiff's federal licenses. To address adequately the new issue raised by Defendant in its opposition, Plaintiff requires an enlargement of the page limit that applies to reply memoranda under Individual Practice 2.C.

Hon. Sidney H. Stein

-2-

Accordingly, Plaintiff respectfully requests permission to file a reply memorandum of no more than 20 pages in support of its motion to dismiss.

Respectfully submitted,

/s/ Richard C. Pepperman II  
Richard C. Pepperman II

cc: Jonathan D. Conley  
(Office of the Attorney General of the State of New York)